

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF NEW YORK**

**In re:
KRIS ROGLIERI, Debtor
Chapter 7 Case No. 24-10157-REL**

FILED
MAR 24 2025
OFFICE OF THE BANKRUPTCY CLERK
ALBANY, NY

**REQUEST TO SUPPLEMENT MOTION #345 WITH ADDITIONAL
EVIDENCE**

**TO: THE HONORABLE ROBERT E. LITTLEFIELD, JR.,
UNITED STATES BANKRUPTCY JUDGE**

I, **Kris D. Roglieri**, by and through my **Attorney-in-Fact, Linda Oliver**, respectfully request to supplement **Motion #345 (Motion to Remove Trustee Dribusch)** with **additional evidence** regarding his continued failure to manage estate obligations.

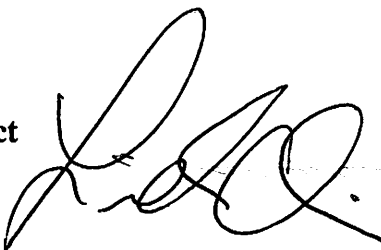
Attached to this request is a **recent electric bill**, which Trustee Dribusch has yet to pay despite his fiduciary duty under **11 U.S.C. § 704(a)(1)** to protect and maintain estate property. The failure to pay this essential utility bill further supports the **grounds for removal** due to mismanagement and neglect.

Relief Requested:

I respectfully ask that this **unpaid electric bill** be added to **Motion #345** for consideration at the continued hearing on **March 20, 2025**.

Dated: March 17, 2025
Respectfully submitted,

Kris D. Roglieri
By: **Linda Oliver, as Attorney-in-Fact**
N-4 #45131
Rensselaer County Jail
4000 Main Street
Troy, NY 12180



nationalgrid

SERVICE FOR
KRIS D ROGLIERI
40 NORTH RD
QUEENSBURY NY 12804

RECEIVED

MAR 14 2025

BILLING PERIOD

Jan 29, 2025 to Feb 27, 2025

ACCOUNT NUMBER

3117

PLEASE PAY BY

Mar 29, 2025

PAGE 1 of 3

ACCOUNT DUE

\$ 20,101.24

www.nationalgridus.com

CUSTOMER SERVICE

1-800-642-4272

GAS EMERGENCIES

1-800-892-2345

(Does not replace 911 emergency medical service)

OUTAGE AND ELECTRIC EMERGENCIES

1-800-867-5222

CORRESPONDENCE ADDRESS

300 Erie Blvd West
Syracuse, NY 13202

DATE BILL ISSUED

Mar 5, 2025

ACCOUNT BALANCE

Previous Balance	18,610.40
Payment Received	No payments have been received during this billing period - 0.00
Balance Forward	18,610.40
Current Charges	+ 1,490.84
Amount Due ▶	\$ 20,101.24

To avoid late payment charges of 1.5%, \$ 20,101.24 must be received by Mar 29 2025.

SUMMARY OF CURRENT CHARGES

	DELIVERY SERVICES	SUPPLY SERVICES	TOTAL
Electric Service	376.95	1,113.89	1,490.84
Total Current Charges	\$ 376.95	\$ 1,113.89	\$ 1,490.84

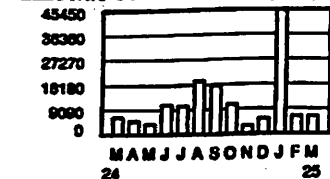
☎ Save time and money! Sign up for paperless billing and receive a \$ 0.41 credit on your monthly bill. Visit our website to enroll today!

👷 Utility Worker Safety Reminder: State laws are in place to help protect utility workers while they are performing their job duties. Causing physical injury to, or assaulting, a utility worker is punishable by law, and penalties include potential jail time.

💡 Payment concerns? We are here to help. To learn about solutions to help you take control of your energy use and bills, visit www.ngrid.com/billhelp.

★ **WILL WE BE ABLE TO REACH YOU DURING A POWER OUTAGE?:** During a power outage, phones with a direct link to a local phone line are able to operate. Phones that are not directly linked (for example, wireless phones with answering machines) need electricity to make/receive calls. If you would like to register another phone number, such as a cell phone, as your account's primary phone number, please go to www.nationalgrid.com/myaccount to update your information so that we may be able to reach you with important information during power outages.

ELECTRIC USAGE HISTORY (kWh)



Daily Averages	Mar 24	Mar 25
kWh	219.3	219.3
Cost	\$ 26.43	\$ 31.40

☒ Actual
 ☐ Estimated

KEEP THIS PORTION FOR YOUR RECORDS.

RETURN THIS PORTION WITH YOUR PAYMENT.

nationalgrid

ACCOUNT NUMBER

3117

PLEASE PAY BY

Mar 29, 2025

AMOUNT DUE

\$ 20,101.24

300 Erie Blvd West
Syracuse NY 13202-0960

ENTER AMOUNT ENCLOSED

\$

Write account number on check and make payable to National Grid

2000782 01 MB 062 **AUTO T3 0 1064 12603-682611 -C02-P00782-1

KRIS D ROGLIERI

11 HILL TOP LN
POUGHKEEPSIE NY 12603-6826

013876

NATIONAL GRID
PO BOX 371376
PITTSBURGH PA 15250-7376

000149084 22714331177002010124088

1001-1001

1001-1001

1001-1001

nationalgrid

March 3, 2025

Bill Account Number: 22714-3117

Service Address: 40 NORTH RD
QUEENSBURY NY 12804

0021345 SP 3562 -C01-P21366-11



KRIS D ROGLIERI
11 HILL TOP LN
POUGHKEEPSIE NY 12603-6826

Additional emergency funding may be available to you because your account is now in disconnect status. Learn more at ngrid.com/billhelp



**THIS IS A FINAL DISCONNECTION NOTICE.
PLEASE REFER TO THIS NOTICE WHEN PAYING THIS BILL.**

We understand these are financially difficult times which may make it challenging to pay your National Grid bill. Your account remains unpaid with a total balance due of \$18,610.40.

If you are unable to pay the past-due balance in full, please call us at 1-800-443-1837 to discuss the possibility of a deferred payment agreement or other options.

You have received a Disconnect Notice which explained that your service could be disconnected at any time after 03/05/2025. Unless full payment is made, your service could be disconnected without further notice.

If your service has been disconnected, please be aware that it may take up to 24 hours to turn your service back on after you have paid your bill. If you have already made payment or made arrangements for payment of your past-due balance, thank you.

This is an important notice. Please have it translated.

Este é um aviso importante. Quiera mandá-lo traduzir.
Este es un aviso importante. Sirvase mandarlo traducir.
Avis important. Veuillez traduire immédiatement.

ĐÂY LÀ MỘT BẢN THÔNG CÁO QUAN TRỌNG
XIN VUI LÒNG CHO DỊCH LẠI THÔNG CÁO ẤY
Questa è un'informazione importante.
Si prega di tradurla.

Это очень важное сообщение.
Пожалуйста, попросите чтобы
вам его перевели.

3562-01-m-0021345-0001-0043321

0016 12

300 Erie Blvd. West, Syracuse, NY 13202-4250
1-800-443-1837 • www.nationalgridus.com

Bill Account Number

Past Due Balance

Total Amount Due

22714-3117

\$18,610.40

\$18,610.40

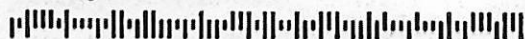
KRIS D ROGLIERI
40 NORTH RD
QUEENSBURY, NY 12804

\$

ENTER AMOUNT ENCLOSED

Write account number on check and make payable to
National Grid

National Grid
PO Box 371376
Pittsburgh, PA 15250-7376



001861040 2271431170001861040062

WITNESSES:
JAMES M. HARRIS, JR.
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UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF NEW YORK

In re:

KRIS D. ROGLIERI, Debtor

Chapter 7 Case No. 24-10157-REL

CERTIFICATE OF SERVICE

I, Linda Oliver, as Attorney-in-Fact for Kris D. Roglieri, hereby certify that on March 17, 2025, I caused a true and correct copy of the following document:

- ~~Request to Supplement Motion #345~~ – **Motion to Remove Trustee Christian H. Dribusch**, including the attached recent electric bill as supporting evidence,

To be served upon the following parties in the manner indicated below:

Via U.S. Mail, First-Class, Postage Prepaid:

Honorable Robert E. Littlefield, Jr.

United States Bankruptcy Court
Northern District of New York
445 Broadway
Albany, NY 12207

Clerk of the United States Bankruptcy Court

United States Bankruptcy Court
Northern District of New York
445 Broadway, Suite 330
Albany, NY 12207

Christian H. Dribusch, Chapter 7 Trustee

Dribusch Law Firm
187 Wolf Road, Suite 300-020
Albany, NY 12205

Office of the United States Trustee

Leo W. O'Brien Federal Building
11A Clinton Avenue, Room 620
Albany, NY 12207

I certify under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Dated: March 17, 2025

Respectfully submitted,

Kris D. Roglieri

By: Linda Oliver, as Attorney-in-Fact

N-4 #45131

Rensselaer County Jail

4000 Main Street

Troy, NY 12180!

A handwritten signature in black ink, appearing to read "L. Oliver", is positioned to the right of the typed name and address. The signature is fluid and cursive.